REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 2, and 6-8 are pending in the present application; Claims 3-5 and 9-15 having been canceled and Claims 1, 2, and 6-8 having been amended by way of the present amendment.

The specification has been reviewed and informalities in the specification including the Abstract have been corrected. Similarly, the claims have been reviewed and amended to be in a more clear form. No new matter has been added.

Claims 3-5 and 9-15 have been canceled as being drawn to a non-elected invention. Applicants reserve the right to pursue these claims in a divisional application to be filed in the future.

Claims 1, 6 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Knowles (U.S. 7,173,651) in view of the Trisno (U.S. 2006/0265482), and Claims 1, 2 and 6-8 stand rejected under 35 U.S.C. § 103 as being unpatentable over Knowles in view of Omi (U.S. 2005/0220117). These rejections are respectfully traversed.

The present invention, as recited in Claim 1, for example, relates to a digital camera. The digital camera includes a device for storing image data, a communication device, and a control device. The control device controls the communication device to broadcast request data over a local area network. When data for responding to the request is received from a piece of equipment which is connected to the local area network, the control device detects an IP address of the equipment from which the response data is sent, and sends the image data which is stored in the storing device to the equipment which includes the detected IP address.

For both rejections under 35 U.S.C. § 103, the outstanding Office Action uses a combination including U.S.P. 7,173,651 to Knowles as the primary reference. However, for

the reasons explained below, one of ordinary skill in the art would have no motivation to modify Knowles and could not modify Knowles in the manner set forth in the outstanding Office Action as such modifications are contrary to the teachings of Knowles.

Knowles is directed towards an apparatus and system for prompt digital photo delivery and archival. In Knowles, the digital camera always communicates with the same server and a single server. This server may relay images to other computers, but because it is intentionally set up to be simple and to have the camera only communicate with a single computer or server, it would be contrary to the teachings of Knowles to have the computer, server, or host system to include a plurality of different server computers.

Referring to Knowles, it is disclosed that the host system or the server is at a predefined Internet Protocol (IP) address.[1] The system of Knowles must provide a simple wireless photo delivery system which requires minimal user inputs for successful configuration and operation.[2] If the user is required to select various computers to which the camera is to be in communication with, this purpose of Knowles is frustrated. In order to have minimal user inputs in simple photo delivery, it would not be obvious to modify Knowles to communicate with a plurality of computers.

In Knowles, it is seen that the computer with which the camera operates is a known IP address.[3] Further and quite importantly, Knowles has a feature of having all communications which are back to the camera routed through the server so that messages cannot be sent to the camera.[4] If it is not possible to communicate with the camera, then it would not be obvious to modify Knowles to have multiple devices communicate with the camera.

Further, the use of the predefined IP address is emphasized twice at col. 3, lines 42-52. Moreover, Knowles discloses that when an image is to be sent to multiple recipients, the

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[1] Knowles at col. 2, lines 52-54.
[2] Id. at lines 64-67.
[3] Id. at col. 3, lines 23-26.
[4] Id. at col. 3, lines 33-42.

image is sent to a single server which then forwards to the image to each intended recipient through a conventional network.[5] Thus, Knowles repeatedly and directly teaches against having communication with multiple computers.

Based on the above exemplary portions of Knowles, it should be apparent that one of ordinary skill in the art would not modify Knowles based on either Trisno or Omi in the manner set forth in the outstanding Office Action, as such modification is contrary to the various purposes of Knowles.

Accordingly, each of the rejections under 35 U.S.C. § 103 is respectfully requested to be withdrawn.

Consequently, in light of the above discussion and in view of the present amendment, the present application is in condition for formal allowance and an early and favorable action to that effect is requested.
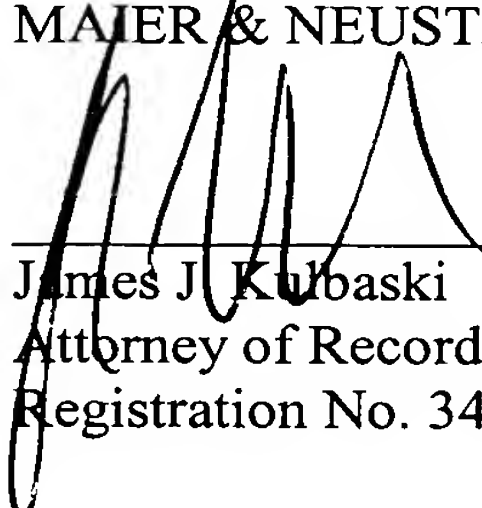
Respectfully submitted,

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[5] Id. at col. 3, lines 57-62.